1 2	ORRICK, HERRINGTON & SUTCLIFFE LLP KAREN G. JOHNSON-MCKEWAN (#121570) kjohnson-mckewan@orrick.com ANNETTE L. HURST (#148738)	BOIES, SCHILLER & FLEXNER LLP DAVID BOIES (pro hac vice) dboies@bsfllp.com 333 Main Street, Armonk, NY 10504
3	ahurst@orrick.com GABRIEL M. RAMSEY (#209218)	Tel: 1.914.749.8200 / Fax: 1.914.749.8300 STEVEN C. HOLTZMAN (#144177)
4	gramsey@orrick.com 405 Howard Street, San Francisco, CA 94105	sholtzman@bsfllp.com 1999 Harrison St., Ste. 900,
5	Tel: 1.415.773.5700 / Fax: 1.415.773.5759 PETER A. BICKS (pro hac vice)	Oakland, CA 94612 Tel: 1.510.874.1000 / Fax: 1.510.874.1460
6	pbicks@orrick.com LISA T. SIMPSON ( <i>pro hac vice</i> )	
7	lsimpson@orrick.com 51 West 52 <sup>nd</sup> Street, New York, NY 10019	
8	Tel: 1.212.506.5000 / Fax: 1.212.506.5151	
9	ORACLE CORPORATION DORIAN DALEY (#129049)	
10	dorian.daley@oracle.com DEBORAH K. MILLER (#95527)	
11	deborah.miller@oracle.com MATTHEW M. SARBORARIA (#211600)	
12	matthew.sarboraria@oracle.com RUCHIKA AGRAWAL (#246058)	
13	ruchika.agrawal@oracle.com 500 Oracle Parkway, Redwood City, CA 94065	
14	Tel: 650.506.5200 / Fax: 650.506.7117	
15	Attorneys for Plaintiff ORACLE AMERICA, INC.	
16		
17	UNITED STATES DISTRICT COURT	
18	NORTHERN DISTRICT OF CALIFORNIA	
19	SAN FRANCISCO DIVISION	
20	ORACLE AMERICA, INC.	Case No. CV 10-03561 WHA
21	Plaintiff,	ORACLE AMERICA, INC.'S RESPONSE TO THE COURT'S
22	V.	FEBRUARY 9, 2016 REQUEST FOR RESPONSE (DKT. 1490)
23	GOOGLE INC.	
24	Defendant.	Dept.: Courtroom 8, 19th Floor Judge: Honorable William H. Alsup
25		
26		
27		
28		
	ORACLE AMERICA, INC.'S RESPONSE TO THE COURT'S FEBRUARY 9, 2016 REQUEST CASE NO. CV 10-03561 WHA	

1 Based on discussions with counsel for Google and LG, Oracle understands that LG's 2 motion concerns four documents that Google identified as responsive to requests for production 3 served by Oracle on September 8, 2015 and/or November 2, 2015, during fact discovery. 4 On December 14, 2015, Google informed Oracle that it would need to provide notice to 5 third parties in connection with the production of certain documents responsive to Oracle's 6 requests, which would provide third parties with fourteen days to seek a protective order. Oracle 7 first heard from LG regarding its intent to seek a protective order on February 8, 2016. 8 Oracle believes that these four documents may be relevant in connection with the expert 9 reports due on February 22, 2016. Oracle therefore opposes LG's request for an extension to 10 February 23, 2016. Oracle has no reason to believe that there are any grounds for a protective 11 order or any further delay in producing these responsive documents. 12 13 Dated: February 10, 2016 BOIES, SCHILLER & FLEXNER LLP 14 By: \_/s/ Steven C. Holtzman 15 STEVEN C. HOLTZMAN Attorneys for Plaintiff 16 ORACLE AMERICA, INC. 17 18 19 20 21 22 23 24 25 26 27 28